

1 Nicole E. Giacinti (SBN 233121)
2 Morris & Giacinti LLP
3 899 Ellis Street
4 San Francisco, CA 94109
5 Tel: (415) 553-3902
6 Fax: (415) 848-9130

7
8 Counsel for Defendant, Michael Tomada

9
10
11 **IN THE UNITED STATES DISTRICT COURT**
12 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

13
14 UNITED STATES OF AMERICA,) No.: **CR14-0285 JST**
15 v. Plaintiff,)
16) **STIPULATION AND [PROPOSED]**
17) **ORDER AUTHORIZING BAIL**
18) **MODIFICATION**
19)
20) Date: October 10, 2014
21) Time: 9:30 a.m.
22) Court: Honorable Jon S. Tigar
23)
24)
25)
26)
27)
28)

1. On June 5, 2014, a detention hearing was held and the Court ordered Mr. Tomada released with certain conditions, including a restriction on his travel outside of the Northern District. Currently, Mr. Tomada is allowed to travel to the Eastern District for work purposes.
2. Mr. Tomada has been abiding by the terms of his pretrial release conditions and now seeks a minor modification of those conditions.
3. Mr. Tomada seeks to modify his pretrial release conditions to allow him to travel to the Eastern District for medical purposes. Mr. Tomada makes this request because his doctor is located at the Kaiser Medical Center in Vallejo.
4. In sum, Mr. Tomada respectfully requests that his conditions of pretrial release be modified to allow him to travel to the Eastern District for medical appointments.

1
2
3
4
5. Neither the government nor pretrial services objects to the request that Mr. Tomada's
conditions of pretrial release be modified to allow him to travel to the Eastern District for
medical appointments.

6
7
It is so stipulated.

8
9
10 August 18, 2014
Dated

11
12
13
14
15 /s/
Kevin Barry
Assistant United States Attorney

16 August 18, 2014
Dated

17
18
19
20
21
22
23
24
25
26
27
28 /s/
Nicole Giacinti
Counsel for Michael Tomada

13
It is so ordered.

14
15 8/22/14
Dated

16
17
18
19
20
21
22
23
24
25
26
27
28

The Honorable Kandis Westmore,
United States Magistrate Judge